

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,
Plaintiff,

15-CV-0495 (KNF) (RA)
NOTICE OF MOTION

-against-

SECOND MOTION FOR
EXTENSION OF TIME TO FILE
OPPOSITION TO MOTION TO DISMISS

HECTOR FIGUEROA, et. al.
Defendants,

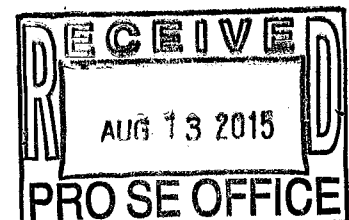
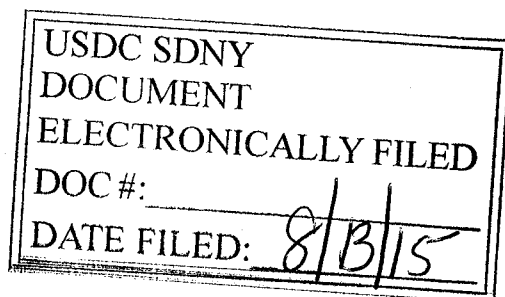
X-----X

PLEASE TAKE NOTICE upon the annexed affirmation of RAMON MODESTO, affirmed on August 12, 2015, plaintiff will move this Court, before KEVIN NATHANIEL FOX, United States Magistrate Judge for an order pursuant to the Federal Rules on Civil Procedure granting plaintiff's second motion for extension of time to file opposition to motions to dismiss filed by various defendants in this case.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: Woodside, New York
August 12, 2015

Ramon Modesto
Ramon Modesto
4029 67 St. 2F
Woodside, NY 11377
Tel. 718-431-5226



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,

Plaintiff,

15-CV-0495 (RA) (KNF)

-against-

**AFFIRMATION IN
SUPPORT OF MOTION**

HECTOR FIGUEROA, PRES. OF SEIU 32 BJ
et.al.

Defendants,

x-----x

I, RAMON MODESTO, affirm under penalty of perjury that:

1. I, RAMON MODESTO, am the plaintiff in the above-entitled action, and respectfully move this Court to issue an order granting plaintiff's second motion for extension of time to file response to defendants motions to dismiss.
The Court issued an order for plaintiff to file his response to the defendants motions to dismiss on or before July 20, 2015 for defendants Michael Rodriguez, Robert Savage, Anthony Waterman, Deetendra Harisaran and Mark Kelly, and on or before July 23, 2015 for defendants Hector Figueroa, Dan Wilson, Johnny Herrera, Israel Melendez and Jusuf Dzaferovic.
2. Plaintiff has filed and was granted a first motion for extension of time to file opposition to motions to dismiss on July 29, 2015.
3. The reason why I am entitled to relief I seek is due to the fact that plaintiff Has filed a default judgment against defendants William Dunn, James Griffin, Frank Anello, Eddie Maldonado, Brenda Johnson and Gloria Ran.
4. Plaintiff needs more time to prepare a responsive pleading to the motions to dismiss filed by the various defendants.

WHEREFORE, I respectfully request that the Court grant this motion, as well as such other and further relief as may be just and proper.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: August 12, 2015
Woodside, New York

Ramon Modesto
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4029 67 St., 2 F
Woodside, NY, 11377
Tel. No. 718-431-5226